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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 In the Matter of:) Case Number 12-42882
11 Hamza Husnain Jafri) Chapter 13
12 Rizwana Babar Jafri) Declaration of Debtors' Attorney and
Debtors) Request for Entry of Order by Default
13

- 14 1. I, Andrew Christensen, am the Movants' Attorney in this matter and declare as follows:
15 2. On 5/7/2012, Movants filed a Motion to Avoid Judicial Liens of Citibank (South Dakota)
16 N.A. on Debtors' Real Property located at 2346 Del Monte Dr. San Pablo, CA 94806.
17 3. Copies of the motion and notice of motion, and the certificate of service are attached
18 hereto.
19 4. Pursuant to Local Bankruptcy Rules 2002 and 9014-1, the motion was served by certified
20 mail on 5/7/2012, together with a notice stating that any party objecting to the motion had
21 21 days within which to file and serve any written objection and request a hearing on the
22 above motion.
23 5. More than 21 days have passed since the service of the notice of motion.
24 6. No objection has been timely served on Movants at the address specified in the notice.
25 Therefore, no hearing is required.
26 7. The proposed Order is submitted herewith.
27
28

WHEREFORE, Movants request that the Order granting the relief requested in the motion be signed and entered forthwith.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the following date at Oakland, California.

Dated: June 1, 2012

/s/ Andrew Christensen

Andrew Christensen

Attorney for Debtor

Max Cline, Esq. SBN 55533
Jason Cline, Esq. SBN 236531
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In the Matter of:) Case Number 12-42882
Hamza Husnain Jafri) Chapter 13
Rizwana Babar Jafri)
Debtors Certificate of Service

CERTIFICATE OF SERVICE

I declare as follows: I am employed in the County of Alameda. I am over the age of eighteen years and not a party to the above referenced case. My business address is 1300 Clay Street, Suite 600, Oakland CA 94612. On June 1, 2012, I served the attached:

- (1) **Proposed Order Avoiding Judicial Liens of Citibank (South Dakota) N.A.**
- (2) **Request for Order by Default and Declaration of Attorney**

On the parties listed below by placing a true copy thereof enclosed in a sealed envelope, with postage thereon fully prepaid, BY FIRST CLASS MAIL, in the United States Postal Service at Oakland, California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on the following date at Oakland, California.

Dated: June 1, 2012

/s/ Andrew Christensen
Andrew Christensen

Citibank (South Dakota) N.A.
Attention: Officer
701 East 60th Street North
Sioux Falls, South Dakota 57104

Citibank (South Dakota) N.A.
C/O The Moore Law Group
PO Box 25145
Santa Ana, CA 92799-2652

The following Parties were served electronically:

Citibank (South Dakota) N.A.
C/O Michael S. Hunt
151 Bernal Road, Suite 8
San Jose CA 95119

Bankruptcy Trustee
Martha G. Bronitsky
P.O. Box 5004
Hayward, CA 94540-5004